



INF. 9

21 November 2019

(English only)

RID: 11th Session of the RID Committee of Experts' standing working group
(Vienna, 25 to 29 November 2019)

Subject: Tanks of RID/ADR Chapter 6.8 with expired inspection dates

Proposal transmitted by Switzerland

Introduction

1. This document discusses the necessity of introducing new texts for tanks covered by RID/ADR Chapter 6.8 in order to clarify the type of inspection to be performed in case the three-month period provided for in 6.8.2.4.3 has expired.
2. A discussion appears to be necessary, as confusion amongst inspection bodies and users occurs concerning the intermediate inspection of tanks, not only in Switzerland, but also in other Member States.
3. As the three-month period referred to in 6.8.2.4.3 is more critical for tank-wagons and tank-containers than for tank-vehicles, the representative of Switzerland would first like to have the views of the RID Committee of Experts' standing working group before submitting a proposal to the RID/ADR/ADN Joint Meeting.

Discussion

4. In September 2019, the RID/ADR/ADN Joint Meeting adopted the new paragraphs 6.7.2.19.6.2, 6.7.3.15.6.2 and 6.7.4.14.6.2 for portable tanks based on the texts of the 21st edition of the UN Model Regulations. These paragraphs are reproduced in document [OTIF/RID/CE/GTP/2019/6](#) for consideration by the standing working group at this session.

5. Paragraph 6.7.2.19.6.2 reads:

"6.7.2.19.6.2 Except as provided for in 6.7.2.19.6.1, portable tanks which have missed the timeframe for their scheduled 5 year or 2.5-year periodic inspection and test may only be filled and offered for carriage if a new 5-year periodic inspection and test is performed according to 6.7.2.19.4."

Paragraphs 6.7.3.15.6.2 and 6.7.4.14.6.2 contain similar wording.

6. These texts were adopted in the UN Model Regulations based on a proposal by the United Kingdom in document [ST/SG/AC.10/C.3/2018/112](#). In this document, the UK identified two cases for which the lack of specific, clarifying text in the Model Regulations was leading to confusion amongst inspection bodies and users:

- Portable tanks used for the transport of dangerous goods that have missed the date for their periodic inspection (2.5 or 5-year);
- Portable tanks switching from the transport of general cargo to the transport of dangerous goods.

7. Switzerland believes that the adopted texts have brought much clarification, in particular by stating that portable tanks that have missed the timeframe **for their 2.5-year periodic inspection** may only be filled and offered for carriage **if a new 5-year periodic inspection** has been performed.

8. As regards RID/ADR tanks, the first part of 6.8.2.4.3 states:

"Shells and their equipment shall undergo intermediate inspections at least every four years/two and a half years after the initial inspection and each periodic inspection. These intermediate inspections may be performed within three months before or after the specified date.

However, the intermediate inspection may be performed at any time before the specified date.

If an intermediate inspection is performed more than three months before the due date, another intermediate inspection shall be performed at the latest four years/two and a half years after this date."

There is no indication on how the tanks should be handled when they have missed the date for the intermediate inspection, that is, after the additional three-month period.

9. To remedy this lack of clarity, a similar provision as in 6.7.2.19.6.2 could be introduced for RID/ADR tanks. This would allow for a uniform approach to how tanks for which the inspection period has expired should be handled.

10. Switzerland wishes to obtain the opinion of the other delegations based on the questions below.

Questions for the standing working group

11. What is the understanding of the current provisions in 6.8.2.4.3?

- When the three-month period after the due date of an intermediate inspection has expired, shells and their equipment shall undergo a periodic inspection according to 6.8.2.4.2; or
- When the three-month period after the due date of an intermediate inspection has expired, shells and their equipment shall undergo an intermediate inspection according to 6.8.2.4.3.

12. Should the approach described in 6.7.2.19.6.2 for portable tanks also apply to tanks covered by RID/ADR Chapter 6.8?
 13. Does it make sense to introduce clarification in RID/ADR 4.3.2.3.7 or 4.3.2.4.4?
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